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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Motors Liquidation Company, et al  
f/k/a General Motors Corp., et al  
  
Debtors.

Chapter 11

Case No. 09-50026 (REG)

**NOTICE OF FILING OF MOTION FOR LEAVE TO FILE OMNIBUS  
COMPLAINT WITH MDL COURT**

1. The motion of even date attached hereto as Exhibit A (the "Motion") was filed with the United States District Court for the Southern District of New York (the "MDL Court") to request permission to file an omnibus complaint (the "Omnibus Complaint") in *In re General Motors LLC Ignition Switch Litigation*, Case No. 14-md-02543-JMF (S.D.N.Y.) (the "MDL Proceeding"). The Omnibus Complaint (if permission to file is granted) would assert claims against New GM: (i) for personal injuries or wrongful deaths that pre-dated the closing date of Old GM's asset sale to New GM and (ii) for economic damages against New GM based on New GM's post-closing date actions and inactions. Other than permission to file the Omnibus Complaint in the MDL Proceeding, no other relief is sought by the Motion.

2. Among the reasons for filing the Motion was the need to apprise the MDL Court of the identity and number of plaintiffs represented by the plaintiffs' law firms (the "Firms") and the need of those plaintiffs to meaningfully participate in the MDL Proceeding. In order to assure that the MDL Proceeding will effectively address the claims asserted by the plaintiffs and to protect their standing and right to be heard, the Motion seeks to bring their claims before the MDL Court in the traditional manner for asserting claims: through the filing of a complaint. Upon the filing of the Omnibus Complaint, the interests of the plaintiffs covered by the Omnibus Complaint and their standing would be on a par with the other plaintiffs in the MDL Proceeding.

3. Because the Firms are aware and mindful of this Court's sale order, the plan injunction, and the various stay stipulations entered into by numerous plaintiffs, (including certain plaintiffs represented by the Firms), neither the Firms nor the plaintiffs that would be covered by the Omnibus Complaint intend to take any step in the MDL Proceeding or otherwise that is not permitted by the MDL Court. The Omnibus Complaint would move apace with the other actions in the MDL Proceeding and be subject to any orders of this Court on the Threshold Issues the same as any other litigant or claimant. To the extent the Motion is granted, plaintiffs expect to enter into a stay stipulation as to the claims in the Omnibus Complaint during the pendency of the orderly and coordinated process before this Court, which Plaintiffs believe will assure the fair adjudication of important issues.

Dated: July 31, 2014

Respectfully submitted,

/s/ Eamonn O'Hagan

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